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June 1, 2020

**VIA ECF**

Hon. Judge Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 12A  
New York, New York 10007

The request to extend Plaintiff's deadline to  
file an Amended Complaint to June 17,  
2020 is granted.

Dated: June 2, 2020

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LORETTA A. PRESKA, USDJ

**Re: *Joan Carrington v. City of New York Human Resources Administration***  
**Civil Case No.: 19-cv-10301-LAP-SDA**

Dear Your Honor:

Please be advised, the undersigned represents Plaintiff Joan Carrington ("Plaintiff") in the above referenced matter. I write to respectfully request an extension of time to file Plaintiff's amended complaint in this action which deadline is currently June 3, 2020. I have conferred with Defendant's counsel who does not object to this request. This is Plaintiff's first request to extend the amended complaint deadlines.

The basis for this request is that due to significant scheduling conflicts and the press of other matters, the undersigned has been unable to effectively and fully confer with Plaintiff and finalize the amended complaint. Specifically, since the Court's order on May 12, 2020, the undersigned has been otherwise engaged drafting oppositions to separate federal motions for summary judgment in two matters, drafting a petition for re-hearing for a matter before the Eighth Circuit Court of appeals, participating in two virtual depositions and a virtual mediation, and personally reviewing and assessing an ESI discovery production consisting of 9,488 ESI documents.

As a result of the foregoing, and in addition to the logistical difficulties the current shelter at home order and government restrictions have presented in conferring with Plaintiff and reviewing the physical files maintained by Plaintiff, the undersigned requires additional time to perfect Plaintiff's Amended Complaint and respectfully asks for a two week extension, making the new deadline June 17, 2020.



ATTORNEYS AT LAW

Counsel remains available should Your Honor have any questions of concerns. Thank you.

Very truly yours,

**NESENOFF & MILTENBERG**

*/s/ Gabrielle Vinci*

**Gabrielle Vinci, Esq.**

CC: All counsel (via ECF)